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June 14, 2000

Paul Peronard
US EPA
501 Mineral Avenue
Libby, MT 59923

Paul Peronard
US EPA
EPR-SA
999 18TH Street, Suite 500
Denver, CO 80202

RE: Millwork West, Inc.

Dear Mr. Peronard:

Please consider this correspondence Millwork West's formal objections to the work plan proposed by W. R. Grace for the decontamination of the export plant site. While the EPA and the City of Libby no doubt have their own objections to the work plan proposed by W. R. Grace, Millwork has its own specific objections to the proposals of W. R. Grace. We understand that W. R. Grace has characterized the administrative order as identifying seven (7) activities for the reclamation of the site:

1. Temporary relocation of the on-site business of the export plant;
2. Cleaning and abatement of contaminated buildings, contents and structures;
3. Site preparation;
4. Excavation of contaminated soil, debris and vermiculite;
5. Preparation of disposal location at the mine;
6. Transportation of disposal of waste, and
7. Property restoration at the export site.

We will follow that format in outlining our objections. These objections are not intended here to be

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We will follow that format in outlining our objections. These objections are not intended here to be exhaustive but only a summary as to the major problems Millwork West has with the proposed plan.

1. Temporary Relocation of On-Site Business.

No accommodations have been made for the temporary relocation of Millwork West during the twenty (20) week reclamation period. Evidently, W. R. Grace expects Millwork West will continue operations on-site during the entire period of reclamation.

Millwork West is a retailing and commercial outlet as well as a remanufacturing plant. While eight of ten days per month will be set aside to allow planer operations, no reasonable provision has been made for daily operations in retail and commercial transactions. Apparently W. R. Grace entertains the idea that Millwork will continue to serve the public retailing and commercial markets while at the same time conducting an extensive and life threatening decontamination process. The plan is simply inadequate to allow Millwork West to continue operations while clean up is taking place, as it does not take into account marketing, traffic and inventory needs.

As a corollary, under Grace's plan, no efforts are undertaken to avoid disruption of Millwork West's customer base.

Further, W. R. Grace proposes a wholly inadequate dust control plan both in the terms of safety of employees and customers. The dust control plan calls for a dedicated water truck or hoses directly connected to the hydrant and under some circumstances the application of magnesium chloride.

In the event W. R. Grace modifies its plan to change the physical location of the business while reclamation is occurring, provisions must be made for individuals not associated with the reclamation to have access to the property in order continue business operations and for the increased labor cost.

2. Cleaning and Abatement of Contaminated Buildings.

Millwork West objects to the proposal of W. R. Grace for the decontamination of the buildings and structures on the property. Millwork West wants the structures removed.

Indisputably, asbestos is toxic. The Burnetts have been subjected to asbestos since they began operations. The mechanism of decontamination proposed by W. R. Grace will not sufficiently protect employees or customers without the removal of the structure. W. R. Grace's proposal that air monitoring will adequately assess safe levels in the structures after cleaning is not acceptable.

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The cleaning method is not calculated to remove asbestos from crevices between materials within the structures. False negatives in the air samples will occur if hard to locate concentrations in the crevices of the buildings is not removed with vacuuming and wet rag mopping. There are no assurances that clean air for a period of twenty (20) weeks during the decontamination process will result in a permanently decontaminated structure. Inadequate provisions have been made by W. R. Grace to remove asbestos lodged between structural supports, metal siding, and interior walls or the like.

3. CERCLA Compliance.

At Section 1, page 8 W. R. Grace takes the position that CERCLA formatting will not be strictly followed. Millwork West objects to a deviation from CERCLA standards and requirements.

4. Site Preparation.

Millwork West objects to the proposed site preparation since the plan does not account for continued business operations. It does not provide for employee access to the site nor customer access to the site. It does not consider the increased labor costs. To the extent that the plan calls for relocation of the business to the sports fields north of the site Millwork strongly objects since portions of that site are also contaminated.

5. Appraisal and Personal Property Validation Plan.

Millwork reserves the right to object to the appraisal plan. No methods for appraisal are identified nor does the plan account for the value of property in a decontaminated state relative to the market pressures.

6. Decontamination Plan.

The buildings are not of a nature or character that decontamination without removal results in a safe reclamation of the property. The buildings should be removed.

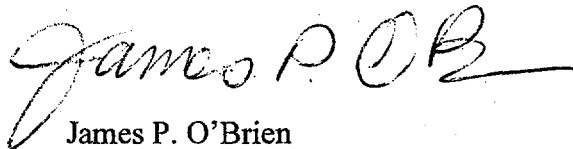
7. Air and Soil Monitoring Requirements.

Millwork West objects to the limited nature of asbestos air and soil monitoring. In particular, Millwork West objects to sole and exclusive reliance on phased contrast microscopy. Other more advanced technological mechanisms are available to perform sampling of the site and Millwork West objects to any sampling technique which is out-dated or insufficient with respect to current technology.

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Given the choice between the EPA plan and W. R. Grace's plan, Millwork West will support the EPA plan if forced to chose. In summary, Millwork West requires, at minimum, temporary relocation of their business to a safe site capable of sustaining their market. Millwork West also requires demolition, removal and replacement of the structures.

Very truly yours,

A handwritten signature in cursive script, reading "James P. O'Brien", with a long horizontal flourish extending to the right.

James P. O'Brien

JPO:jma